



**MCI Telecommunications  
Corporation**

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**Susan Jin Davis**  
Senior Counsel  
Federal Law and Public Policy

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APR 29 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

April 29, 1998

**VIA HAND DELIVERY**

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
1919 M Street, NW Room 222  
Washington, DC 20554

Re: Ex Parte Presentation in CC Docket No. 97-231; CC Docket No. 97-121; CC Docket No. 97-208; CC Docket No. 97-137 ✓

Dear Ms. Salas:

On Wednesday, April 29, 1998, Jo Gentry, Senior Manager of Western Financial Operations, Carroll Barrack, Technical Advisor of National Carrier Requirements, Michael Messina, Senior Staff Member of Service Delivery Business Initiatives, Karen Reidy, Attorney, Mark Schneider, attorney with Jenner and Block, and the undersigned met with Melissa Newman, Bill Bailey, Jake Jennings, and David Kirschner of the Policy Division and Greg Cooke of the Network Services Division.

The purpose of the meeting was to discuss unbundled local switching. The attached documents outline the topics discussed.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,



Susan Jin Davis

**Attachments**

cc: Carol Matthey  
Michael Pryor  
Melissa Newman  
David Kirschner  
Bill Bailey  
Jake Jennings  
Greg Cooke



# **Unbundled Local Switching**

**MCI Telecommunications  
Corporation**  
April 29, 1998



# What is ULS

Key Components of Unbundled Switching:

- Line Port
- Trunk Port
- Features and functionality
- Usage



# ULS Promotes Competition

- Market Entry
  - Rural
  - Urban
- Product Flexibility
  - Offer different vertical feature packaging than RBOC



# MCI's ULS Requests

- Operator Services
  - MCI provided
- Directory Assistance
  - MCI provided
- NXX
  - LATA wide calling
- Code Conversion
  - 555 converted to 1234
- IntraLATA Toll
  - Pre 2 PIC



# MOSS and FGD

- Modified Operator Signaling System (MOSS)
  - Uses multifrequency (MF) inband signaling, and
  - Operator call control signaling
- Feature Group D (FGD)
  - Utilizes SS7 signaling which routes traffic based on Carrier Identification Code (CIC)
  - Type of call identified in the Initial Address Message (IAM) parameter
  - RBOCs currently deliver 0+ calls to MCI via FGD
  - MCI requests this same feature and functionality for 0-calls

Industry Market  
370 Third Street, Room 307  
San Francisco, California 94107

**PACIFIC\*BELL**  
A Pacific Telesis Company

April 21, 1998

Stephen Vivien  
MCI Telecommunications Corporation  
201 Spear Street  
6th Floor  
San Francisco, CA 94107

Dear Stephen:

Thank you for your letter dated March 16, 1998 to Will Schutts regarding ULS Option C with Feature Group D Signaling.

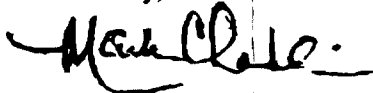
As we have communicated previously, Customized Routing of Operator Services and/or Directory Assistance calls utilizing Feature Group D signaling is not defined in the Interconnection Agreement (ICA). Furthermore, based on our initial analysis on this request, we were not able to accomplish an operationally acceptable solution. Therefore, Pacific Bell requires that MCI submit a bonafide request as defined in the ICA to determine if this network element is technically feasible.

Currently, the process for ordering Unbundled Switching Option C parallels the process in place to order Unbundled Switching Option B. Information on the ordering process can be found on-line in the CESAR Guideline and the CLC Handbook. As requirements are further defined, processes may be enhanced to support the unique requirements of Option C.

Pacific Bell is unclear on MCI's perception that we require a "trunk between [our] switch and the MCI collocation". Pacific Bell requires that custom routed traffic be handed off to MCI's network in the office in which it originates. This requires that MCI have a dedicated end office trunk group to which Pacific Bell will pass the traffic. This may be a facility purchased as Unbundled Dedicated Transport or one which will connect to MCI's collocation arrangement.

Please send the complete description of your Feature Group D signaling request to me at your earliest convenience. Pacific will review the request and advise MCI of the technical feasibility and the costs associated with the request.

Sincerely,

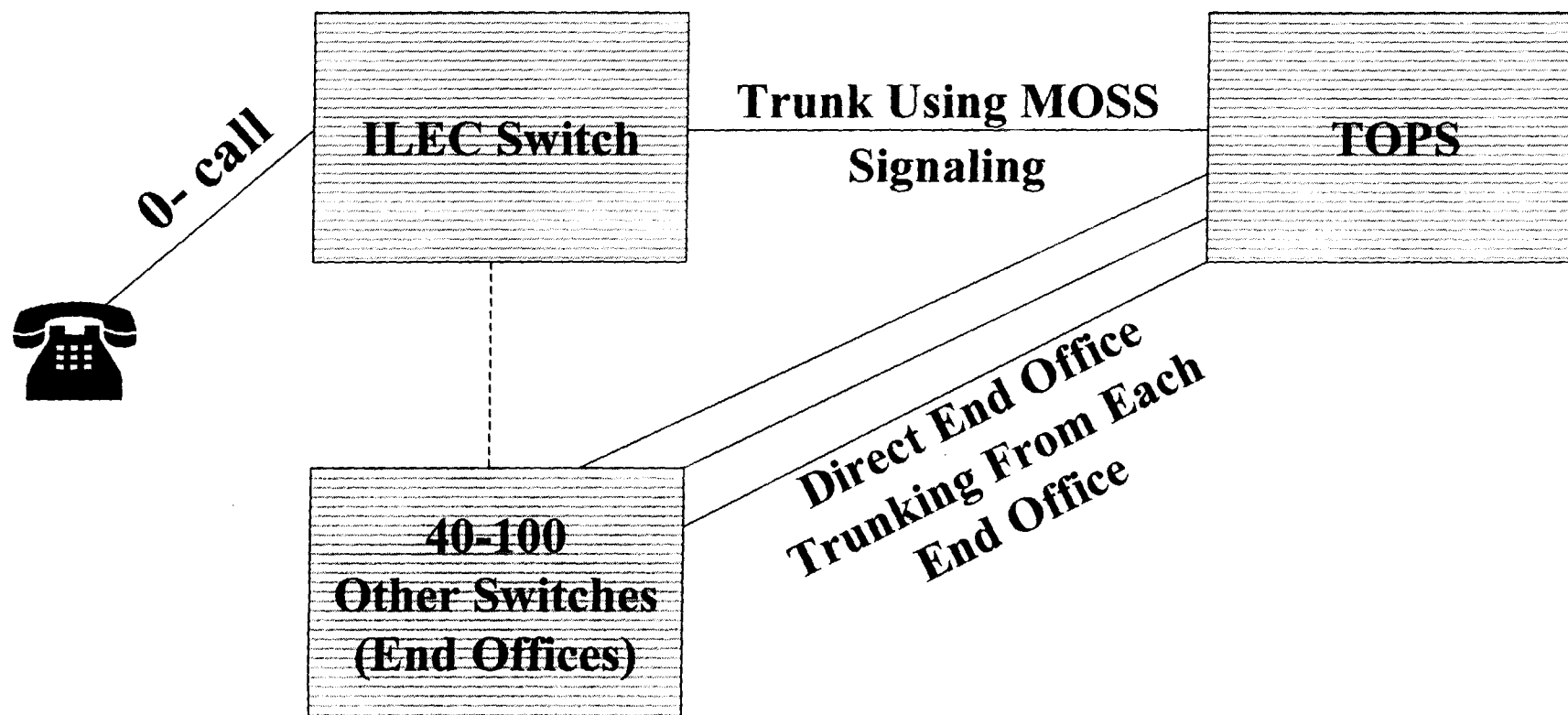


Mark Chamberlin  
Account Manager

cc: M. Dillard



# ILEC Existing Network (Operator Services)





# MCI Network (Operator Services)

